

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**C-BONS INTERNATIONAL GOLF  
GROUP, Inc.**

**Plaintiff,**

**v.**

**LEXINGTON INSURANCE CO., and  
WILLIS TOWERS WATSON US LLC**

**Defendants.**

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**CIVIL ACTION NO.** 3-19-cv-00663

**NOTICE OF REMOVAL**

Defendant **WILLIS TOWERS WATSON US LLC**<sup>1</sup> files this Notice of Removal for the purpose of removing this cause to the United States District Court for the Northern District of Texas, Dallas Division, and states as follows:

**I. STATE COURT ACTION**

This is an action filed on or about February 13, 2019 in the District Court of Dallas County, Texas, being numbered DC-19-02211.

Plaintiff C-Bons International Golf Group, Inc. asserts eleven causes of action related to purported coverage for alleged property damage to several of its golf courses caused by Hurricane Harvey under an insurance policy issued by Defendant Lexington Insurance Company and placed by Defendant Willis Towers Watson US LLC. Plaintiff alleges damages and seeks monetary relief in excess of \$1,000,000.00.<sup>2</sup>

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<sup>1</sup> Upon information and belief, Plaintiff has incorrectly identified Willis Towers Watson US LLC as a defendant herein; the appropriate defendant is instead Willis of Illinois, Inc.

<sup>2</sup> See Plaintiff's Original Petition at p. 1; *see also id.* at p. 3 wherein Plaintiff "claim[s] damages of over \$10,000,000."

## II. FEDERAL JURISDICTION

Plaintiff is incorporated under the laws of Nevada and has its principal place of business in Arizona. Plaintiff is thus a citizen of Nevada and/or Arizona for diversity jurisdiction purposes.

Defendant Lexington Insurance Company is incorporated under the laws of Delaware and has its principal place of business in Boston, Massachusetts. Lexington is thus a citizen of Delaware and/or Massachusetts for diversity jurisdiction purposes.

Defendant Willis Towers Watson US LLC (“Willis”) is a limited liability company organized under the laws of Delaware and has its principal place of business at 800 N. Glebe Road, Arlington, Virginia 22203. The citizenship of a limited liability company is determined by the citizenship of each of its members.<sup>3</sup> Defendant Willis’s sole shareholder is Towers Watson Delaware Holdings LLC, a Delaware limited liability company with its principal place of business in Virginia. Towers Watson Delaware Holdings LLC’s sole shareholder is WTW Delaware Holdings LLC, a Delaware limited liability company with its principal place of business in Delaware. WTW Delaware Holdings LLC’s sole shareholder is Willis US Holding Company, LLC, a Delaware limited liability company with its principal place of business in Delaware. Willis US Holding Company, LLC’s sole shareholder is Willis North America Inc., a company incorporated under the laws of Delaware and with its principal place of business in New York. Willis is thus a citizen of Delaware, Virginia, and New York for diversity jurisdiction purposes.<sup>4</sup>

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<sup>3</sup> *Harvey v. Great Wolf Drilling Co.*, 542 F.3d 1077, 1080 (5th Cir. 2008).

<sup>4</sup> In the event Willis of Illinois, Inc. is named as a defendant in this action, there will still be diversity of citizenship. Willis of Illinois, Inc., is incorporated in Illinois, and has a principal place of business at 233 S. Wacker Drive, Suite 2000, Chicago, IL 60606. It is thus a citizen of Illinois for diversity jurisdiction purposes.

The amount in controversy is in excess of \$75,000, exclusive of interest and costs. Here, the Petition states that Plaintiff seeks to recover monetary relief of over \$1,000,000.<sup>5</sup> There is therefore complete diversity of citizenship and a sufficient amount in controversy to confer jurisdiction on this Court pursuant to 28 U.S.C. §1332. The above-described civil action is therefore one that may be removed pursuant to 28 U.S.C. §§1332, 1441, and 1146 and is hereby removed.

### **III. STATE COURT DOCUMENTS ATTACHED**

This Notice of Removal has been filed within thirty (30) days after receipt, through service or otherwise, of Plaintiff's Original Petition, filed in the District Court of Dallas County, Texas. Plaintiff's Original Petition was served on Defendant Lexington on February 21, 2019 and was served on Defendant Willis on February 21, 2019. Removal is therefore timely under 28 U.S.C. §1446(b). Pursuant to 28 U.S.C. § 1446(a), Defendants have filed as the Appendix to this Notice of Removal a complete copy of the State's Court file, including copies of all process, pleadings, orders and the Docket Sheet in the State Court action.

Pursuant to 28 U.S.C. § 1446(d), Defendants will notify the Clerk of the Court in the State Court action of this removal, and will give notice thereof to all adverse parties.

### **IV. RELIEF REQUESTED**

Defendant Willis Towers Watson US LLC respectfully requests that Cause No. DC-19-02211 in the District Court of Dallas County, Texas be removed to the United States District Court for the Northern District of Texas, Dallas Division, and that this Court accept this Notice of Removal and that it assume jurisdiction of this case and issue such further orders and processes as may be necessary to bring before it all parties necessary for the trial hereof.

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<sup>5</sup> See Plaintiff's Original Petition at p. 1; *see also id.* at p. 3 wherein Plaintiff "claim[s] damages of over \$10,000,000."

As required by Local Rule 81.1, a copy of each of the following is attached to (or filed with) this Notice:

1. An index of all documents attached to (or filed with) this Notice that clearly identifies each such document and indicates the date the document was filed in state court (if applicable);
2. A copy of the docket sheet in the state court action;
3. Each document filed in the state court action (as separate attachments arranged in chronological order according to state court filing date); and
4. A separately signed certificate of interested persons that complies with Local Rule 3.1(c).

Respectfully submitted,

**MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.**

By: /s/ Sheryl Kao  
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**ATTORNEYS FOR DEFENDANT  
WILLIS TOWERS WATSON US LLC**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing instrument has been mailed, e-mailed, telecopied or hand delivered to all attorneys of record, in compliance with the FEDERAL RULES OF CIVIL PROCEDURE, on this the 15th day of March, 2019.

*/s/ Sheryl Kao*

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**SHERYL KAO**